

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.04-11555-NMG
	)	
\$7,000 in U.S. Currency, and	)	
\$8,000 in U.S. Currency,	)	
Defendants.	)	
-----	)	
Chad Miller	)	
Gary Sanders	)	
Claimants.	)	

**JOINT MOTION FOR JUDGMENT AND ORDER OF FORFEITURE**

The United States of America, by its attorney Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Chad Miller and Gary Sanders (the Claimants), by their attorney, hereby move for entry of a Judgment and Order of Forfeiture as set forth in the document filed herewith.

In support of this motion, the parties state that the United States and the Claimants, through their attorneys, have reached a settlement of this case. This settlement includes the agreement of the United States to forbear from seeking the forfeiture of the entire \$7,000 and \$8,000 in U.S. currency (collectively, "the Defendant Currency") and the agreement by each of the Claimants to the forfeiture of a portion of his interest in the Defendant Currency. Specifically, Claimant Chad Miller agrees to the

forfeiture of \$4,000 in U.S. currency and Claimant Gary Sanders agrees to the forfeiture of \$3,500 in U.S. currency. A copy of the stipulation of settlement between the parties is attached hereto as Exhibit 1.

In accordance with the attached Stipulation of Settlement, the parties have agreed to the entry of the attached Judgment and Order of Forfeiture, which shall be the final judgment in this civil forfeiture action.

WHEREFORE, the parties jointly request that this Court enter the attached proposed Judgment and Order of Forfeiture.

Respectfully submitted,

MICHAEL J. SULLIVAN,  
UNITED STATES ATTORNEY

By:

/s/ Jennifer H. Zacks

Jennifer H. Zacks  
Assistant US Attorney  
John Joseph Moakley Federal  
Courthouse  
One Courthouse Way  
Suite 9200  
Boston, MA 02210  
617-748-3100  
Dated: July 1, 2005

CHAD MILLER

by:

/s/ John J. Bonistalli (jhz)

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John J. Bonistalli  
Law Offices of John J. Bonistalli  
One Financial Center  
Boston, MA 02109

617-695-0053

Dated:

GARY SANDERS

by:

/s/ John J. Bonistalli (jhz)

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John J. Bonistalli  
Law Offices of John J. Bonistalli  
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Boston, MA 02109

617-695-0053

Dated:

